

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MARYLAND

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JULIE A. SU, ACTING SECRETARY OF LABOR, :  
UNITED STATES DEPARTMENT OF LABOR, :

Plaintiff, :

v. :

Case 1:24-cv-00060-JMC

JONES DYKSTRA AND ASSOCIATES, INC.; :  
BRIAN E. DYKSTRA; and the JONES DYKSTRA :  
AND ASSOCIATES, INC. 401(K) PROFIT :  
SHARING PLAN, :

Defendants. :

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**REQUEST FOR ENTRY OF DEFAULT AND TO RE-OPEN CASE**

Plaintiff JULIE A. SU, Acting Secretary of Labor, United States Department of Labor, requests entry of default by the Clerk of Court against all defendants and that the case be re-opened. In support of this, undersigned counsel affirms:

1. The Acting Secretary filed this case on January 8, 2024. *See* Dkt. Entry 1. The Acting Secretary quickly dismissed her action against then-defendant Keith J. Jones but not the remaining defendants. *See* Dkt. Entry 1.

2. In accordance with Rule 4(d) of the Federal Rules of Civil Procedure, the Acting Secretary sent requests for waiver of service of summons to the remaining defendants through Brian Dykstra at 604 Hawkesbury Terrace, Silver Spring, MD 20904.

3. Defendants completed the forms to waive service of summons and returned them to the Acting Secretary, which forms the Acting Secretary filed in this Court. *See* Dkt. Entries 8-12.

4. The deadline for defendants to answer the complaint was March 11, 2024.

7. To date, defendants have failed to answer, plead, or defend in this action as required by the Federal Rules of Civil Procedure.

8. Defendants are not minors, incompetent, or engaged in military service.

DATED: March 12, 2024  
New York, New York

Respectfully submitted,

SEEMA NANDA  
Solicitor of Labor

JEFFREY S. ROGOFF  
Regional Solicitor

/s Michael R. Hartman  
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*Attorneys for the Acting Secretary*